REMARKS

The Office Action rejected claims 1-11, 19-20, 24, and 34-37 under 35 U.S.C. 102(b) as being anticipated by Andrews et al. (U.S. Patent No. 4,848,143 "Andrews"). The Office Action rejected claims 9, 21-23, and 25-27 under 35 U.S.C. 103(a) as being unpatentable over Andrews. The Office Action allowed claims 29-33 and objected to claims 12-18 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claim. The Applicants thank the Examiner for indicating the allowability of claims 12-18 and 29-33. The Applicants respectfully traverse the prior art rejections.

Claims 1-11 are not anticipated by Andrews

The Office Action cites Andrews at Figure 9 (related description at col. 11, lines 39-67) as teaching all elements of claim 1. Claim 1 is directed to a network spanning heterogeneous call center controller for use with a circuit-switched private branch exchange and a packet-switched private branch exchange that includes: (1) a circuit-switched private branch exchange interface to communicate with the circuit-switched private branch exchange; (2) a packet-switched private branch exchange interface to communicate with the packet-switched private branch exchange; and (3) a processor communicatively coupled to the circuit-switched private branch exchange interface and to the packet-switched private branch exchange interface. Applicants disagree that Andrews discloses all of these elements.

First, Applicants disagree with the Office Action's assertion that: (1) "buses leading from the controller to the public network is considered a PBX"; and (2) "buses leading from the controller to the internet is considered a PBX". (Office Action at Page 2). A PBX (Private Branch Exchange) is a private telephone switching system, usually located on a customer's premises connecting a common group of lines from one or more central offices to provide

service to a number of individual phones. FIG. 1 of the present application discloses a circuit-switched PBX (PSTN PBX 12) that couples to a plurality of agents 46-48, the PSTN 18, and the network spanning heterogeneous call center controller 14. FIG. 1 further discloses a packet-switched PBX (IP PBX 16) that couples to a plurality of agents 52-56, the Internet 20, and the network spanning heterogeneous call center controller 14. FIG. 9 of Andrews does not disclose a controller that interfaces to both a circuit-switched PBX and to a packet-switched PBX as is required by claim 1. In contradistinction to the requirements of claim 1, FIG. 9 of Andrews discloses the controller 30A' interfacing directly to the PSTN (12, 14, and 16) and to the Internet 408. FIG 14 of Andrews illustrates a PBX 56. The description of the PBX 56 of Andrews is correct but is inconsistent with the Office Action's assertions.

Second, Applicants disagree that Andrews discloses a circuit-switched private branch exchange interface and/or a packet-switched private branch exchange interface. The interfaces of the controller 30A' of FIG. 9 of Andrews interface either directly to the PSTN (12, 14, and 16) or interface directly to the Internet 408. These interfaces do not interface to a packet-switched private branch exchange or interface to a circuit-switched private branch exchange as required by claim 1.

For at least these reasons, Andrews fails to render obvious claim 1. Claims 2-11 depend from claim 1 and are not rendered obvious by Andrews for the reasons described above with respect to claim 1. Claim 2 is also separately allowable because it requires, and Andrews does not disclose, limitations regarding messaging between the interfaces and the respective private branch exchanges. Claims 3-10 depend either directly or indirectly from claim 2 and are allowable for these same reasons.

Claims 19-20 and 24 are not anticipated by Andrews

Claim 19 is directed to a method of operating a network spanning call center controller that couples to both a circuit-switched private branch exchange and to a packet-switched private branch exchange. The method includes: (1) receiving an indication that a circuit-switched call has been received by the coupled circuit-switched private branch exchange; and (2) communicating an instruction message to transfer the call to an agent terminal coupled to either the circuit-switched private branch exchange or to the Public Switched Telephone Network coupled to the circuit-switched private branch exchange.

As argued above with reference to claim 1, Andrews does not disclose a network spanning call center controller that couples to both a circuit-switched private branch exchange and to a packet-switched private branch exchange. Further, Andrews does not disclose communicating between the network spanning call center controller and either the circuit-switched private branch exchange or the packet-switched private branch exchange. For these reasons, Andrews does not anticipate claim 19.

Claims 20-24 depends from claim 19 and are not rendered obvious by Andrews for reasons described above with regard to claim 19. Claim 24 is also additionally not anticipated by Andrews because it requires, and Andrews does not disclose, limitations regarding messaging between the network spanning call center controller and the packet-switched private branch exchange.

Claims 34-37 are not anticipated by Andrews

Claim 34 is directed to a method for operating a network spanning heterogeneous call center controller with a circuit-switched private branch exchange and a packet-switched private branch exchange. The method includes: (1) receiving a circuit-switched call event from the circuit-switched private branch exchange; (2) receiving an internet protocol call event from the

packet-switched private branch exchange; and (3) receiving an internet protocol call event from the packet-switched private branch exchange.

As argued above with reference to claim 1, Andrews does not disclose a network spanning call center controller that couples to both a circuit-switched private branch exchange and to a packet-switched private branch exchange. Further, Andrews does not disclose communicating between the network spanning call center controller and either the circuit-switched private branch exchange or the packet-switched private branch exchange. For these reasons, Andrews does not anticipate claim 34.

Claims 35-37 depend from claim 34 and are not rendered obvious for reasons described above with regard to claim 34. Claim 35 (and claims 36-37 that depend from claim 35) are also allowable because it requires, and Andrews does not disclose, limitations regarding messaging between the network spanning call center controller and the private branch exchanges. Claims 36 and 37 include additional limitations requiring these message types, which are further not disclosed by Andrews.

Claims 9, 21-23, and 25-27 are not rendered obvious by Andrews

Andrews fails to anticipate (and also to render obvious) claim 8. Claim 9 depends from claim 8 and is not rendered obvious by Andrews for these same reasons.

Andrews fails to anticipate (and also to render obvious) claim 19. Claims 21-23 and 25-27 depend from claim 19 and are not rendered obvious by Andrews for these same reasons.

CONCLUSIONS

All claims are now allowable and a notice of allowance is courteously solicited. Please direct any questions or comments to the undersigned attorney at the address indicated.

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Respectfully submitted,

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